

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

JONATHAN R., minor, by Next
Friend SARAH DIXON, *et al.*

Plaintiffs,

v.

JIM JUSTICE, in his official capacity as
the Governor of West Virginia, *et al.*

Defendants.

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No. 3:19-cv-00710-JRG

UNOPPOSED MOTION FOR SECOND AMENDED PROTECTIVE ORDER

Defendants move for the entry of a proposed agreed amended protective order, filed herewith. The Parties have agreed to the language of the proposed order.

Pursuant to Local Rule of Civil Procedure 26.4(a), parties must move only for good cause to deviate from the form Protective Order provided by the Southern District of West Virginia. The Parties agree that the proposed amended order will facilitate time-efficient document production by addressing confidentiality designations in ESI specifically.

October 27, 2023

Respectfully submitted,

Attorneys for Defendants

/s/ Philip J. Peisch

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